

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEREMY BAILEY,
PLAINTIFF,

FILED
SCRANTON

OCT 18 2021

No. 1:20 - cv -1836

V.

Per. 
DEPUTY CLERK

DISTRICT JUDGE: KANE

LIEUTENANT YODER,
SERGEANT R. BATIUK,
C/O DERR,
C/O ANTHONY,

PLAINTIFF FOURTH SET OF INTERROGATORIES TO DEFENDANT

In accordance with Rule 33 of the Federal Rules of civil procedure, plaintiff requests that Defendant lieutenant yoder answer the following interrogatories under oath, and that the answer be sign by the person making them and serve on plaintiff within 30 days of service of these interrogatories.

If you cannot answer the following interrogatories in full , after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswer portions.

These interrogatories shall be deemed continuing , so as to require supplemental answers as new and different information materialize.

QUESTION

1. State and name the reason inmate McCullough # GA - 6396 was originally house in the R. H. U.
2. As a lieutenant shift commander, or supervisor in the R. H. U., are you at all times aware of any cell exexchange.
3. As a lieutenant shift commander or supervisor in the R. H. U. are you the one who give the order for the cell exchanges
4. On sept, 10 2019 during a unrelated incident in the R. H. U. on pod (1) while you was one of the responding officers and both inmates Bailey # LZ - 4437 and McCullough # GA - 6396 notified you of inmate McCullough # GA - 6396 Z - CODE and threats why you did not remove inmate McCullough # GA - 6396 from the cell instead of telling both inmates to get away from the cell door.
5. State and name the reason inmate McCullough # GA - 6396 have a Z - CODE.
6. State and name what was you informed about the incident after the fact .
7. State and name did any of the officers such as your self included receive any disiplinary action resulting from the incident on sept, 10 2019.

DATE: 10.14.2021

JEREMY BAILEY,

(SCN) COALTOWNSHIP

1 KELLEY DRIVE

COALTOWNSHIP, PA 17866.

